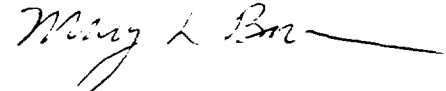


Respectfully submitted,

A handwritten signature in cursive script, reading "Mary L. Brown", followed by a long horizontal flourish line.

Mary L. Brown

MCI WORLDCOM, INC.
1801 Pennsylvania Ave. NW
Washington, D.C. 20006
(202) 887-2551

November 1, 1999

AFFIDAVIT OF SHERRY LICHTENBERG

1. My name is Sherry Lichtenberg and I am Senior Manager, Product Development for MCI WorldCom, Inc. My duties include designing, managing, and implementing MCI WorldCom's provision of local telecommunications services to residential customers on a mass market basis in New York and nationwide, including operations support systems ("OSS") and facilities testing. My team is responsible for third party testing, market entry analysis, initial customer trials, and sales and support process development for all local entry opportunities throughout the country. I have testified on these issues at the New York State Public Service Commission hearings on 271 matters, at the Pennsylvania "Global" hearings, at the Bell Atlantic - GTE merger hearings in Virginia, and have participated in discussions with a variety of state commissions, the Federal Communications Commission and the Department of Justice. I have 18 years of experience in the telecommunications industry, including 3 years with MCI WorldCom and 15 years with AT&T. I have been directly involved in all aspects of local customer sales, support, and care at MCI WorldCom since our initial decision to enter the New York local market.
2. The purpose of this declaration is to explain MCI WorldCom's experience in working with CPNI issues as we have entered the New York market. CPNI regulations have presented substantial challenges to the company, and in some respects appear to conflict with customer expectations about information that the

customer wants us to have. - -

3. In response to regulatory activities and Bell Atlantic commitments in the New York market, MCI WorldCom decided to enter the market for residential customers by purchasing unbundled network element platform (UNE-P) service from Bell Atlantic. We viewed UNE-P as the only practical vehicle for addressing the mass market in New York quickly, and the combination of regulatory decisions made by the Federal Communications Commission and New York Public Service Commission made entry into the New York market a viable business for us.
4. MCI WorldCom launched local service in New York's LATA 132 in December 1998. MCI WorldCom expanded its local service to upstate New York in February 1999. The majority of our local sales are generated from outbound telemarketing calls because this is the only practical way for us to inform customers about the existence of competition while managing the less-than-commercial volumes of local sales that Bell Atlantic's systems were and are capable of supporting during 1999.
5. MCI WorldCom currently has over 160,000 customers in New York who are currently served or in the process of being provisioned. To achieve that success, we have participated in hundreds of thousands of marketing conversations with potential customers who we have contacted, or who have contacted us.
6. The vast majority of new MCI WorldCom residential local customers

want their new service to have exactly the same types of features and services as they had on their existing or former service. Based on sales reporting and monitoring of actual sales calls, I estimate that approximately two-thirds of customers want to keep their service exactly as it is with Bell Atlantic.

7. MCI WorldCom offers all of the features that Bell Atlantic offers, and to the same extent that Bell Atlantic does, with one exception. That exception is that we do not provide Bell Atlantic provisioned voice mail, due to regulatory rulings which make that feature unavailable to us. In the process of placing customer orders, however, we are not able to view customer service records to determine what features exist. It is my understanding that in order to view these records, MCI WorldCom would need to take the customer through a lengthy, detailed "long form" consent process. It is MCI WorldCom's business judgment that such long form consent would have a significantly adverse ability on a prospective customer's willingness to complete his or her order.
8. Because we do not obtain access to feature information, we do not accept "migrate as is" orders for UNE-P. Our inability to view feature information, and to know with specificity which features are installed for a customer, and in particular whether the customer subscribes to voice mail, mean that we cannot simply tell a customer that he or she will get exactly what they have today. Our practice is to place orders with a specified list of features that the customer tells us he or she wants during the sales call. We call this "migrate as specified".
9. In my experience, the majority of new MCI WorldCom residential local

customers are not able to accurately and completely describe all of their existing services and features. Furthermore, customers do not have in their possession any document that displays the feature information we need to place their local service order. This information is not available on the customer's bill, because the bill does not contain the customer service record codes necessary for MCI WorldCom to order the correct features.

10. During the course of the last year, I have found that customers expect that their new service provider has access to their existing or former CPNI, and especially the information needed to initiate their service. In addition, I have found that customers want MCI WorldCom to know the services, features, PICs, freezes and other aspects of how their existing local service is set up so that their order can be completed accurately and efficiently.
11. There are at least three types of problems that come from restrictions on CPNI availability during the ordering process. First, MCI WorldCom can place the order incorrectly, ordering the wrong version of Caller ID, for example, instead of the correct one. The customer will discover the error, contact us, and we will need to resubmit a new order to modify the feature to the customer's liking. This is frustrating and costly for the customer and carrier alike.
12. Second, a customer could request a feature but that feature is not available at his or her particular location due to limitations on the software resident in Bell Atlantic's serving office. In these cases, the incumbent will reject the order. The rejection then needs to be investigated and further communication to the customer

is required. Finally, a new order must be resubmitted. All of this takes time and interferes with the customer obtaining the service he or she wants with the carrier he or she has selected.

13. Finally, the absence of feature information prevents MCI WorldCom from initiating a "migrate as is" order, a method of ordering UNE-P that would, in theory, take only 48 hours to provision instead of 3 to 4 days. For example, if a customer orders Caller ID and Bell Atlantic knows that the customer is already receiving Caller ID as part of the existing service from Bell Atlantic, it can put the order through without delay. Without this knowledge, Bell Atlantic must investigate whether the local switch serving the customer can support Caller ID service. This process requires an additional 3 to 4 days, unnecessarily delaying the order's completion. This occurs frequently since Caller ID is the single most popular feature among New York customers.

14. Another popular service that presents significant challenges is voice mail. In New York, voice mail is not available as an unbundled network element, and MCI WorldCom does not provision it as part of UNE-P. If a customer forgets to tell us that he or she has voice mail, the customer will lose voice mail functionality without understanding that MCI WorldCom cannot provide it as part of this particular service arrangement. Customers perceive this as an error on the new entrant's part. We anticipate that our inability to screen for the problem and disclose it on the sales call will contribute to needless complaints about local service.

15. At the present time, MCI WorldCom understands that we are required to provide all four prongs of an oral consent, even on inbound calls. The fourth prong of the consent is to tell consumers that their failure to provide consent to view CPNI will not adversely affect their service. My experience is that on inbound calls, this warning is at best meaningless, and at worst, confusing. Customers have expressed no concern that their existing service might be affected if they decline to provide CPNI consent. In many cases, when the Commission-prescribed warning language is read to them, many customers indicate confusion about why we would feel the need to tell them that their service will not be affected if they say no.
16. This concludes my declaration on behalf of MCI WorldCom.

SENT BY:MCI Telecommunications:11- 1-99 : 14:11 :LEGAL & EXT. AFFAIRS-
FROM MCI FEDERAL REGULATORY

202 887 2204: 2- 2

(MON) 11- 1-99 15:08/ST. 15:08/NO. 4260330878 P 1

I declare under penalty of perjury under the laws of the United States of America
that the foregoing joint declaration on behalf of MCI WorldCom is true and correct to the
best of my knowledge and belief.

Sherry Lichtenberg 11-1-99
Sherry Lichtenberg

Certificate of Service

I, Barbara Nowlin do hereby certify that on this 1st day of November, 1999, copies of the foregoing MCIWorldCom Petition for Further Reconsideration were served by first-class U.S. mail, postage prepaid, to the following persons at the addresses listed below.

Larry Strickling **
Chief, Common Carrier Bureau
Federal Communications Commission
Portals
445 12th Street, S.W.
Washington, D.C. 20554

Carol Matthey **
Chief, Policy Division
Federal Communications Commission
Portals
445 12th Street, S.W.
Washington, D.C. 20554

Margaret Egler **
Deputy Chief, Policy Division, CCB
Federal Communications Commission
Portals
445 12th Street, S.W.
Washington, D.C. 20554

Bill Agee **
Policy Division, CCB
Federal Communications Commission
Portals
445 12th Street, S.W.
Washington, D.C. 20554

International Transcription Service**
1919 M Street, N.W. Suite 214
Washington, D.C. 20554

Carl W. Northrop
Christine M. Crowe
Paul, Hastings, Janofsky & Walker
1299 Pennsylvania Avenue, N.W.
10th Floor

Washington, D.C. 20004-2400

Judith St. Ledger-Roty
Lee A. Rau
Reed Smith Shaw & McClay
1301 K Street, N.W., Suite 1100 - East
Tower
Washington, D.C. 20005

Pamela Riley
AirTouch Communications, Inc.
One California Street
San Francisco, CA 94111

Mark J. Golden
Vice President of Industry Affairs
Personal Communications Industry
Association
500 Montgomery Street, Suite 700
Alexandria, VA 22314-1561

Philip F. McClelland
Assistant Consumer Advocate
Office of Attorney General
Office of Consumer Advocate
1425 Strawberry Square
Harrisburg, PA 17120

Mark Cooper
Consumer Federation of America
1424 16th Street, N.W.
Suite 604
Washington, D.C. 20036

Assemblyman Anthony J. Genovesi
Legislative Office Building
Room 456

Albany, NY 12248-0001

Jim Smith
Excel Telecommunications, Inc.
1133 Connecticut Avenue, N.W.
Suite 750
Washington, D.C. 20036

Thomas K. Crowe
Law Office of Thomas K. Crowe
2300 M Street, N.W.
Suite 800
Washington, D.C. 20037

David J. Gudino
GTE Service Corporation
1850 M Street, N.W.
Suite 1200
Washington, D.C. 20036

Richard McKenna
600 Hidden ridge
Irving, TX 75015

Jay C. Keithley
Sprint Corporation
1850 M Street, N.W.
Suite 1110
Washington, D.C. 20036

Craig T. Smith
P.O. Box 11315
Kansas City, MO 64112

Michael J. Shortley, III
frontier Corporation
180 South Clinton Avenue
Rochester, NY 14646-0700

Ann P. Morton, Esq.
Cable & Wireless, Inc.
8219 Leesburg Pike
Vienna, VA 22182

Jonathan E. Canis
Reed Smith Shaw & McClay
1301 K Street, N.W., Suite 1100
East Tower
Washington, D.C. 20005

Glenn S. Rabin
ALLTEL Corporate Services, Inc.
655 15th Street, N.W.
Suite 200
Washington, D.C. 20005

Cindy Z. Schonhaut
Vice President, Government Affairs
INTELCOM GROUP (U.S.A.), INC.
9605 East Maroon Circle
Englewood, CO 80112

Albert H. Kramer
Robert F. Aldrich
Dickstein, Shapiro & Morin, L.L.P.
2101 L Street, N.W.
Washington, D.C. 20554

Teresa Marrero
Senior Regulatory Counsel
Teleport Communications Group, Inc.
One Teleport Drive, Suite 300
Staten Island, NY 10310

Dennis C. Brown
Brown and Schwaninger
1835 K Street, N.W., Suite 650
Washington, D.C. 20006

Robert McDowell
The Competitive Telecommunications
Association
1140 Connecticut Avenue, N.W.
Suite 220
Washington, D.C. 20036

Danny E. Adams
Kelley Drye & Warren LLP
1200 19th Street, N.W.
Suite 500
Washington, D.C. 20036

Linda Kent
United States Telephone Association
1401 H Street, N.W.
Suite 600
Washington, D.C. 20005

Charles C. Hunter
Hunter & Mow, P.C.
1620 I Street, N.W.
Suite 701
Washington, D.C. 20006

James Bradford Ramsay
National Association of Regulatory Utility
Commissions
1201 Constitution Avenue, N.W.
Suite 1102
P.O. Box 684
Washington, DC 20044

Peter Arth, Jr.
Attorneys for the People of the State of
California and the PUC of the State of
California
505 Van Ness Avenue
San Francisco, CA 94102

Jackie Follis
Public Utility Commission of Texas
7800 Shoal Creek Boulevard
Austin, TX 78757-1098

Lawrence W. Katz
1320 Not Court House Road
8th Floor
Arlington, VA 22201

James D. Ellis
Southwestern Bell Telephone Company
One Bell Center Room 3520
St. Louis, MO 63101

Saul fisher
NYNEX Telephone Companies
1095 Avenue of the Americas
New York, NY 10036

Kathryn Marie Krause
US West Inc.
1020 19th Street, N.W.
Suite 700
Washington, D.C. 20036

William B. Barfield
BellSouth Corporation
1155 Peachtree Street, N.E.
Atlanta, GA 30309-3610

David L. Meier
Cincinnati Bell Telephone
201 E. Fourth Street
P.O. Box 2301
Cincinnati, OH 45201-2301

Alan N. Baker
Attorneys for Ameritech
2000 West Ameritech Center Drive
Room 4H82
Hoffman Estates, IL 60196

Lucille M. Mates
Pacific Telesis Group
1275 Pennsylvania Avenue, N.W.
Washington, D.C. 20004

Randolph J. May
Sutherland, Asbill & Brennan
1275 Pennsylvania Avenue, N.W.
Washington, D.C. 20004-2404

Compuserve Inc.
5000 Arlington Centre Boulevard
P.O. Box 20212
Columbus, OH 43220

Joseph P. Markoski
Squire, Sanders & Dempsey
1201 Pennsylvania Avenue, N.W.
P.O. Box 407
Washington, D.C. 200044

Theodore Case Whitehouse
Willkie Farr & Gallagher
3 Lafayette Centre
1155 21st Street, N.W.
Washington, D.C. 20036

Albert Halprin
Halprin, Temple, Goodman and Sugrue
1100 New York Avenue, N.W.
Suite 650E
Washington, D.C. 20005

Debra Berlyn
Competition Policy Institution
1156 15th Street, N.W.
Suite 310
Washington, D.C. 20005

David Cosson
NTCA
2626 Pennsylvania Avenue, N.W.
Washington, D.C. 20037

Stuart Polikoff
OPASTCO
21 Dupont Circle, N.W.
Suite 700
Washington, DC 20036

Lawrence G. Malone
State of New York Dept of
Public Service
Three Empire State Plaza
Albany, NY 12223-1350

Katherine Abernaty
AirTouch Communications, Inc.
1818 N Street, N.W.
Suite 800
Washington, D.C. 20036

Mary Mack Adu
Public Utilities Commission of
The State of California
505 Van Ness Avenue
San Francisco, CA 94102

Todd F. Silbergeld
SBC Communications Inc.
1401 I Street, N.W.
Suite 1100
Washington, D.C. 20005

Charles C. Hunter
Hunter & Mow, P.C.
1620 I Street, N.W.
Suite 701
Washington, D.C. 20006

Jack B. Harrison
Frost & Jacobs LLP
2500 PNC Center
201 East Fifth Street
Cincinnati, OH 45202

David L. Meier
Cincinnati Bell telephone
201 E. Fourth Street
P.O. Box 2301
Cincinnati, OH 45201-2301

James D. Ellis
SBC Communications Inc.
175 E. Houston
Room 1254
San Antonio, TX 78205

A. Carven Gilbert III
Bellsouth Corporation
1155 Peachtree Street, N.E.
Atlanta, GA 30309-3610

Lawrence W. Katz
Bell Atlantic Telephone Companies
1320 North Court House Road
8th Floor
Arlington, VA 22201

Campbell L. Ayling
NYNEX Telephone Companies
1095 Avenue of the Americas
Room 3725
New York, NY 10036

Patricia L.C. Mahoney
Pacific telesis Group
140 Montgomery
San Francisco, CA 94105

Judy Sello
AT&T Corporation
Room 3245G1
295 North Maple Avenue
Basking Ridge, NJ 07920

Wendy S. Bluemling
The Southern New England
Telephone Company
227 Church Street
New Haven, CT 06510

J.G. Harrington
Dow, Lohnes & Albertson, PLLC
1200 New Hampshire Avenue, N.W.
Suite 800
Washington, D.C. 20036

David W. Zesiger
Independent Telephone &
Telecommunications Alliance
1300 Connecticut Avenue, N.W.
Washington, DC 20036

Michael S. Wroblewski
Blooston, Mordkofsdy,
Jackson & Dickens
2120 L Street, NW.
Suite 300
Washington, DC 20037

Russell M. Blau
Swidler & Berlin, Ckhtd.
3000 K Street, N.W.
Suite 300
Washington, D.C. 20007

Kathy L. Shobert
General Communications, Inc.
901 15th Street, N.W.
Suite 900
Washington, D.C. 20005

James H. Bolin, Jr.
AT&T Corporation
Room 3247H3
295 North Maple Avenue
Basking Ridge, NJ 07920

Latham & Watkins
1001 Pennsylvania Avenue, N.W.
Suite 1300
Washington, D.C. 20004-2505

Edward Shakin
Bell Atlantic Long
Distance Carriers
1320 North Court House Road
8th Floor
Arlington, VA 22201

Mary W. Marks
SBC Communications Inc.
One Bell Center
Room 3536
St. Louis, MO 63101

Robert M. Lynch
SBC Communications Inc.
175 E. Houston
San Antonio, TX 78205

Ava B. Kleinman
AT&T Corp
295 North Maple Avenue
Room 3252J1
Basking Ridge, NJ 07920

Robert B. McKenna
Richard A. Karre
US West, Inc.
1020 19th Street, NW
Suite 700
Washington, DC 20036

Marlin D. Ard
Randall E. Cape
Patricia L. Mahoney
Pacific Telesis Group
140 New Montgomery Street
Room 1517
San Francisco, CA 94105

Robert J. Butler
R. Michael Senkowski
Angela N. Watkins
Wiley, Rein & Fiedling
1776 K Street, NW
Washington, DC 20006

Robert J. Gryzmala
Robert M. Lynch
Durward D. Dupre
Michael J. Zpevak
Southwestern Bell Telephone
One Bell Center, Room 3520
St. Louis, MO 63101

A. Kirven Gilbert III
M. Robert fSutherland
BellSouth Corporation
1155 Peachtree Street, NE

Atlanta, GA 30309

Richard A. Muscat
Advisory Commission on State Emergency
Communications
333 Guadalupe, Suite 2-212
Austin, TX 78701

David G. Frolio
BellSouth
1133 21st Street, N.W.
Suite 900
Washington, DC 20036

Richard A. Karre
US West Inc.
1020 19th Street, NW
Suite 700
Washington, DC 20036

Mitchell Brecher
Stephen Holsten
Fleischman and Walsh
1400 16th Street, NW
Washington, DC 20036

John Goodman
Bell Atlantic
1300 I Street, NW
Washington, DC 20005

Gary L. Phillips
Ameritech
1401 H Street, NW
Suite 1020
Washington, DC 20005

Patrick Berdge
Public Utilities Commission of California
505 Van Ness Avenue
San Francisco, CA 94102

Danny E. Adams
Kelley Drye & Warren
1200 19th Street, NW

Washington, DC 20036

Cynthia B. Miller
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399

Jonathan Jacob Nadler
Squire, Sanders & Dempsey
1201 Pennsylvania Avenue, NW
P.O. Box 407
Washington, DC 20004

Daniel C. Duncan
Information Industry Association
1625 Massachusetts Avenue, NW
Suite 700
Washington, DC 20036

Andrew D. Lipman
Swidler Berlin Shereff Friedman
3000 K Street, NW
Suite 300
Washington, DC 20007

William J. Celio
Michigan Public Service
Commission
6545 Mercantile Way
Lansing, MI 48910

Eric Witte
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102

Blossom A Peretz
New Jersey Div. Of the Ratepayers
Advocate
31 Clinton Street, 11th Floor
Newark, NJ 07101

Mary E. Burgess
NYS Department of Public Service
Three Empire State Plaza

Albany, NY 12223

Donald C. Rowe
NYNEX Corporation
111 Westchester Avenue
White Plains, NY 10604

Leon Kestenbaum
Sprint Corp
1850 M Street, NW
Suite 1100
Washington, DC 20036

John L. McGrew
Brian Conboy
Willkie Farr & Gallagher
Three Lafayette Centre
1155 21st Street, NW
Washington, DC 20036

Alfred M. Mamlet
Steptoe & Johnson
1330 Connecticut Avenue, NW
Washington, DC 20036

Teressa Marrero
Teleport Communications Group
One Teleport Drive
Staten Island, NY 10311

Lesla Lehtonen
Calif. Cable Television Assn.
4341 Piedmont Avenue
P.O. Box 1180
Oakland, CA 94611

Ruth Baker-Battist
Voice-Tel
5600 Wisconsin Avenue
Suite 1007
Chevy Chase, MD 20815

Joel Bernstein
Halprin, Temple, Goodman

and Sugrue
1100 New York Avenue, NW
Suite 650E
Washington, DC 20005

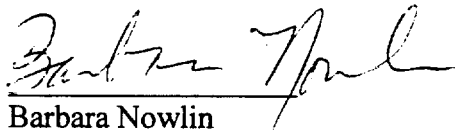
Werner K. Hartenberger
Dow, Lohnes & Albertson
1200 New Hampshire Avenue, NW
Suite 800
Washington, DC 20036

William Balcerski
NYNEX Companies
1095 Avenue of the Americas
Room 3723
New York, NY 10036

Alan Ciamporcero
Southwestern Bell Telephone Co
140 New Montgomery Street
Room 1525
San Francisco, CA 94105

Richard L. Hetke
Ameritech
30 South Wacker Drive
Chicago, IL 60606

Hand Delivered**


Barbara Nowlin